

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK**

-----X

**UNITED STATES OF AMERICA**

**-v-**

**20 CR 293 (WFK)**

**OLUWAGBENGA AGORO,  
LORENZO BAILEY,  
QUINCY BATTICE,  
JEAN FREMONT,**

**Defendants.**

-----X

**HON. WILLIAM F. KUNTZ  
UNITED STATES DISTRICT JUDGE**

**UNITED STATES DISTRICT COURT FOR THE  
EASTERN DISTRICT OF NEW YORK  
225 CADMAN PLAZA EAST  
BROOKLYN, NEW YORK**

**JURORS ARE INSTRUCTED TO CALL: 1-\_\_\_\_\_**

**ON \_\_\_\_\_ AFTER 7 P.M.**

**FOR FURTHER REPORTING INSTRUCTIONS.**

**United States v. Agoro et al.**  
**20 Cr. 293 (WFK)**

**JUROR INFORMATION SHEET**

THE ANSWERS TO THE QUESTIONS ON THIS PAGE WILL BE DISCLOSED ONLY TO  
THE APPROPRIATE COURT PERSONNEL, AS DIRECTED BY THE PRESIDING JUDGE

Please complete the following:

Name: \_\_\_\_\_

Address: \_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

Home Phone: \_\_\_\_\_

Work Phone: \_\_\_\_\_

Cell Phone: \_\_\_\_\_

WHEN YOU HAVE COMPLETED THE QUESTIONNAIRE, PLEASE COMPLETE THE  
FOLLOWING DECLARATION:

**DECLARATION**

I solemnly state that my answers to the questions set forth in the attached questionnaire  
are, to the very best of my ability, true and correct.

Date: \_\_\_\_\_

\_\_\_\_\_  
(Signature)

**United States v. Agoro, et al.**  
**20 Cr. 293 (WFK)**

**JUROR QUESTIONNAIRE  
PRELIMINARY INSTRUCTIONS**

Upon your oath or affirmation, you must give true and complete answers to all questions. These questions are not meant to ask unnecessarily about personal matters. Rather, these questions will help the Court determine whether you can be fair and impartial in deciding this case and will also provide information about you as a juror to help the parties select a jury. Remember there are no “right” or “wrong” answers; there are only truthful answers. Part of the selection process depends on your ability and promise to follow the law as it is explained by the Court. Thus, some of the questions include descriptions of legal principles and ask whether you can conscientiously follow them.

THE COURT INSTRUCTS YOU NOT TO DISCUSS THE QUESTIONS AND ANSWERS WITH FELLOW JURORS. IT IS VERY IMPORTANT THAT YOUR ANSWERS BE YOUR OWN INDIVIDUAL ANSWERS. Further, the Court instructs you not to discuss anything about the case with anyone: not the lawyers, your fellow jurors, your family, your friends, or anyone else.

Please write in dark ink and try to write as legibly as possible. It is very important that the answers be yours and yours alone. Please write your juror number on the top of each page where indicated.

Please place an asterisk (\*) next to any answers where—to the extent the Court or parties have any follow-up questions—you would want to have the additional discussion in private.

Jury service is one of the most important duties a citizen can be called on to perform. You will be fulfilling your civic duty by responding completely and honestly to all questions in this questionnaire and in court during jury selection. Your participation and cooperation in this process is greatly appreciated.

### SUMMARY OF THE CHARGES

You are being considered to serve as a juror in a criminal case. Jury selection is scheduled to begin on October 17, 2022. Trial is expected to take approximately three to five weeks once a jury is selected. Trial will be in session, generally speaking, from 9:30 am to 5:00 pm. The trial will be in recess for major holidays. If you are selected to serve as a juror, you will be required to be present for as long as the trial lasts.

The defendants are charged in an indictment with a criminal offense. An indictment listing the criminal charges against a defendant is not proof of anything. It is simply the document used to advise a defendant of the accusations against him. The indictment is not evidence. The names of the defendants are listed alphabetically and no assumptions should be made regarding any defendant's alleged involvement in any of crimes charged based upon the order in which the defendants names are listed in the indictment.

The law presumes that all defendants are innocent. Each of the defendants has pleaded not guilty to the charges in the indictment. It is the government that has the burden of proof under our system of law. The prosecution must prove beyond a reasonable doubt that a defendant has committed a crime before a defendant can be found guilty. A defendant has no obligation to produce any evidence or to prove that he is not guilty. This is because the law presumes a defendant to be innocent of the charges brought against him.

The following is a summary of the charges in this case. The indictment in this case charges that, on November 7 and 9, 2020, the defendants, in relation to their membership and association with the Folk Nation Gangster Disciples, a street gang that operates out of Brooklyn, New York, engaged in four drive-by shootings. The government alleges that as a result of these actions, three individuals were non-fatally injured. In addition, the indictment charges one defendant with extortion and robbery.

Remember that under the law an indictment is not evidence, it is merely an accusation, and that a defendant is presumed to be innocent of the charges described in an indictment unless and until the government establishes a defendant's guilt beyond a reasonable doubt. If you are selected as a juror in this case, it will be your duty to determine whether, based solely on the evidence presented at trial, the government has proved beyond a reasonable doubt that a defendant is guilty of the crime or crimes charged.

Even though there are four defendants who are being tried together at this trial, you will have to render individual verdicts – GUILTY or NOT GUILTY – as to each defendant and each count or charge in the Indictment. The guilt or lack of guilt of each defendant is a separate decision for a jury to make with regard to each defendant, each of whom is presumed to be innocent of all charges even though the evidence in this case will be presented by the Government simultaneously at a trial with respect to all of the defendants.

QUESTIONNAIRE AND JURY SELECTION

As noted, the purpose of this questionnaire is to assist the court and the parties in selecting a jury of individuals that can be fair and impartial. As noted above, the trial will begin with jury selection on October 17, 2022. It is anticipated that the trial will last between approximately three to five weeks. Trial will be in session, generally speaking, from 9:30 am to 5:00 pm. The trial will be in recess for major holidays. If you are selected to serve as a juror, you will be required to be present for as long as the trial lasts. There are no plans to sequester the jury, meaning you will go home every day after court.

The Court views service on a jury in a federal criminal trial to be one of the highest duties a citizen owes to the United States. Mere inconvenience or the usual financial hardships of jury service will not be sufficient to excuse a prospective juror.

**PART I: HARDSHIP**

1. Do you have an unusual financial hardship or other serious problem that would prevent you from serving as a juror in this case?

Yes \_\_\_\_\_ No \_\_\_\_\_

If yes, please explain:

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If yes, are there any arrangements that you can make to alleviate the hardship:

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2. Do you have any pre-paid travel or other plans from October 17, 2022, through November 18, 2022?

Yes \_\_\_\_\_ No \_\_\_\_\_

If yes, please explain:

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If yes, are there any arrangements that you can make to alleviate the hardship:

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**PART II: BACKGROUND**  
**(Questions 3 through 19)**

**Part II asks questions about you, your background and very general questions about your family.**

3. Do you have any difficulty reading or understanding English?

Yes \_\_\_\_\_ No \_\_\_\_\_

If yes, please explain:

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4. Do you have any physical or medical condition (such as hearing, eyesight, back problems or medication you are taking), or any emotional problem, that would make it unusually difficult for you to serve as a juror in this case?

Yes \_\_\_\_\_ No \_\_\_\_\_

If yes, please describe:

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5. What is your age? \_\_\_\_\_

6. Are you:

Married \_\_\_\_\_  
Living with a Partner \_\_\_\_\_  
Single \_\_\_\_\_  
Divorced/Separated \_\_\_\_\_  
Widow/Widower \_\_\_\_\_

7. Do you:

Live in a dwelling that you or your relatives own? \_\_\_\_\_  
Live in a dwelling with your family? \_\_\_\_\_

Other than spouse or partner, who lives with you? (Do not mention their names; rather, indicate what their relationship is with you, e.g., "roommate" or "parent.")

\_\_\_\_\_

What is their employment? \_\_\_\_\_

8. If you live in Brooklyn, in what area or neighborhood do you live (e.g., Canarsie, Brownsville, Flatbush)?

\_\_\_\_\_

9. What other areas or neighborhoods have you lived in over the past 5 years?

\_\_\_\_\_

\_\_\_\_\_

10. Are you (check any and all that apply):

Employed full-time? \_\_\_\_\_ Retired? \_\_\_\_\_

Employed part-time? \_\_\_\_\_ Disabled and unable to work? \_\_\_\_\_

Work at home? \_\_\_\_\_ Student? \_\_\_\_\_

Homemaker? \_\_\_\_\_ If a student, what area of study?  
\_\_\_\_\_

11. (a) What is your current occupation (or what is your most recent occupation if retired or not presently working)? Do not name your company or workplace, only your occupation and the type of company you work for.

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- (b) Have you ever held a management or supervisory position? If yes, please explain.

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- (c) How long have you worked in your present job? \_\_\_\_\_

- (d) Will your employer pay you during your jury service?

Yes \_\_\_\_\_ No \_\_\_\_\_

If yes, for how long?

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If you do not know whether your employer will pay you during your jury service or for what period of time you will be paid, please find out before you return to court.

12. If you are retired or unemployed, what type of work did you last do?

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13. How far did you go in school?

Elementary School: Yes \_\_\_\_\_ No \_\_\_\_\_



High School: Yes \_\_\_\_\_ No \_\_\_\_\_  
Grade Completed: \_\_\_\_\_ G.E.D. \_\_\_\_\_

College: Yes \_\_\_\_\_ No \_\_\_\_\_  
Level Completed / Degree Earned: \_\_\_\_\_

Post Graduate: Yes \_\_\_\_\_ No \_\_\_\_\_

If you earned a degree after high school, what was your major area(s) of study?

\_\_\_\_\_

14. If you are married or have a partner, please answer the following questions about your spouse/partner's employment:

(a) Is your spouse/partner employed? \_\_\_\_\_

If so where and what type of job? \_\_\_\_\_

\_\_\_\_\_

(b) If your spouse/partner is retired or not employed, please indicate this and also describe the type of work he or she did during his/her last period of employment:

\_\_\_\_\_

15. Have you or any member of your family or close friends worked for, volunteered in, applied for a position with, or in any way been affiliated with the U.S. Attorney's Office, a District Attorney's Office, the Federal Bureau of Investigation, the New York City Police Department, or any other law enforcement agency?

Yes \_\_\_\_\_ No \_\_\_\_\_

If yes, when, where and what agency? Please describe:

\_\_\_\_\_

\_\_\_\_\_

16. If you answered yes to question 15, do you believe that would affect your ability to serve as a fair and impartial juror?

Yes \_\_\_\_\_ No \_\_\_\_\_

If yes, please explain:

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17. (a) Have you, a family member or anyone close to you, ever had any education, training, work or volunteer experience in the following areas (please check all that apply):

Corrections/Jails/Prisons ☐ Myself ☐ Family ☐ Friend  
 Criminal Justice/Law Enforcement ☐ Myself ☐ Family ☐ Friend  
 Firearms/Guns/Ballistics ☐ Myself ☐ Family ☐ Friend  
 Forensic Science ☐ Myself ☐ Family ☐ Friend  
 Law/Legal Field ☐ Myself ☐ Family ☐ Friend  
 Medicine/Nursing ☐ Myself ☐ Family ☐ Friend  
 Private Security ☐ Myself ☐ Family ☐ Friend

If so, please explain. 

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(b) If you or a family member or close friend works or worked in the criminal justice system, please describe their role and whether they worked for the government or the defense.

18. (a) Have you ever served in the military?

Yes \_\_\_\_\_ No \_\_\_\_\_

(b) What branch? \_\_\_\_\_

(c) What was the highest rank you achieved? \_\_\_\_\_

19. If you have any children, please answer the following:

(a) Please fill out the following chart:

<u>AGE</u>	<u>SEX</u>	<u>EDUCATION LEVEL</u>
_____	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____

**Commented [RD(1):** The government objects to the inclusion of this section as overly broad. Everyone knows someone in the legal or medical field and knowing someone who has worked in corrections, nursing and private security is irrelevant to this case.

The relevant questions for this trial pertain to firearms or forensic science training, which the government has no objection to including. Question 17 already asks if someone has worked at a law enforcement agency and is therefore duplicative.

Finally, to the extent this question is asked it should be limited to an individual's own experience and not cast a broad net to everyone they know.

\_\_\_\_\_

(b) Are any of your children employed?

Yes \_\_\_\_\_ No \_\_\_\_\_

(c) List the occupation(s) of your children:

\_\_\_\_\_

\_\_\_\_\_

20. (a) Have you ever been:

- (i) a juror in a civil case? Yes \_\_\_\_\_ No \_\_\_\_\_
- (ii) a juror in a criminal case? Yes \_\_\_\_\_ No \_\_\_\_\_
- (iii) a grand juror? Yes \_\_\_\_\_ No \_\_\_\_\_

(b) If you have served on a jury, please list below

- a. The approximate date(s);
- b. Whether you served in state court or federal court;
- c. Whether it was a grand jury or a trial jury;
- d. Whether it was a criminal case or a civil case;
- e. What the general nature of the case was (for example, robbery, murder, contract, negligence, medical malpractice, etc.); and
- f. Whether or not a verdict was reached. (If so, do not state what the verdict was)

Date	State/Federal	GJ/Trial Jury	Criminal/Civil	Nature	Reached verdict Y/N

(c) Is there anything about your prior jury service that would impact your ability to be a fair and impartial juror in this case?

Yes \_\_\_\_\_ No \_\_\_\_\_

If yes, please explain:

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**PART III: CRIMINAL JUSTICE SYTEM EXPERIENCES AND BELIEFS**

**(Questions 22 through 32)**

**Part III asks questions about experiences you may have had and opinions you may have formed. Again, there are no right or wrong answers. Please be as thoughtful and candid as possible.**

21. Have you ever been arrested?

Yes \_\_\_\_\_ No \_\_\_\_\_

If yes, please explain the circumstances and the result:

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Have any of your close relatives or close friend ever been arrested.

If yes, please explain the circumstances and the result.

22. (a) Have you or any of your relatives or close friends had negative experiences with law enforcement officers, including a negative experience after being stopped by the police?

Yes \_\_\_\_\_ No \_\_\_\_\_

If yes, please explain:

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(b) Have you or any of your relatives or close friends had positive experiences with law enforcement officers?

Yes \_\_\_\_\_ No \_\_\_\_\_

If yes, please explain:

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If you answered yes to questions 23 or 24(a) and/or (b), do you believe that would affect your ability to serve as a fair and impartial juror?

Yes \_\_\_\_\_ No \_\_\_\_\_

If yes, please explain:

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23. Have you, or have any of your relatives or close friends ever been the victim of a crime?

Yes \_\_\_\_\_ No \_\_\_\_\_

If yes, please explain:

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24. If you answered yes to question 26, do you believe that would affect your ability to serve as a fair and impartial juror?

Yes \_\_\_\_\_ No \_\_\_\_\_

If yes, please explain:

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25. (a) Have you or has a family member or close friend ever been involved in or been the target of a criminal investigation?

Yes (self) \_\_\_\_\_ Yes (family/friend) \_\_\_\_\_ No \_\_\_\_\_

If yes, please generally describe the circumstances surrounding the criminal investigation(s) and your relationship(s) to the person(s) involved:

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- (b) Have you or has a family member or close friend ever been charged with a crime?

Yes (self) \_\_\_\_\_ Yes (family/friend) \_\_\_\_\_ No \_\_\_\_\_

If yes, please generally describe the circumstances surrounding the criminal investigation(s) and your relationship(s) to the person(s) involved:

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- (c) If you answered “yes” to (a) or (b) above, was the individual who was investigated or charged treated fairly by the criminal justice system?

Yes \_\_\_\_\_ No \_\_\_\_\_

If no, please explain:

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- (d) Do you have or have you ever had a close friend or family member in prison?

Yes \_\_\_\_\_ No \_\_\_\_\_

If yes, without mentioning names, please explain:

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- (e) If you answered yes to (a), (b) or (d), above, is there anything about these facts that would make it difficult for you to sit as a fair and impartial juror in this case?

Yes \_\_\_\_\_ No \_\_\_\_\_

If yes, please explain:

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- (f) The defendants are charged in relation to their membership in and association with a gang. Is there anything about the nature of these charges, in and of themselves, that would interfere with your ability to fairly decide this case impartially in accordance with the instructions of the court?

Yes \_\_\_\_\_ No \_\_\_\_\_

If yes, please explain:

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26. On the topic of gangs:

- (a) Do you have any particular knowledge about any street gangs?

☐ Yes ☐ No

- (b) Would the fact that you may hear evidence about street gangs affect your ability to follow the Court's instructions and serve as a fair and impartial juror?

☐ Yes ☐ No

- (c) Have you, any family members, or anyone close to you, ever known anyone who was involved in a street gang?

☐ Yes ☐ No

If yes, please explain. \_\_\_\_\_

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27. On the topic of firearms:

- (a) Do you think gun laws should be more restrictive? ☐ Yes ☐ No
- (b) Do you think gun laws should be more lenient? ☐ Yes ☐ No
- (c) Do you or any members of your household own any firearms? ☐ Yes ☐ No

28. Have you, a family member or anyone close to you, ever been the victim of or a witness to a crime, whether or not that crime was reported to law enforcement?

Yes \_\_\_\_\_ No \_\_\_\_\_

If yes, please explain:

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29. Do you have any bias, sympathy, or prejudice with reference to the United States government that would make it difficult for you to render a fair and impartial judgment based solely on the evidence presented at trial?

Yes \_\_\_\_\_ No \_\_\_\_\_

If yes, please explain:

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30. Do you have (very positive or very negative) about law enforcement officers, prosecuting attorneys or criminal defense attorneys that would make it difficult for you to render a fair and impartial judgment based solely on the evidence presented at trial?

Yes \_\_\_\_\_ No \_\_\_\_\_

If yes, please explain:

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31. (a) If the evidence established a defendant's guilt beyond a reasonable doubt, do you have any religious, philosophical, moral or other belief that might make you unable to render a "guilty" verdict?



Yes \_\_\_\_\_ No \_\_\_\_\_

If yes, please explain:

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- (b) If the Government failed to prove a defendant's guilt beyond a reasonable doubt with respect to a particular charge, would you have any difficulty or problem in rendering a "not guilty" verdict?

Yes \_\_\_\_\_ No \_\_\_\_\_

If yes, please explain:

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32. You may hear testimony from or about the people listed on Attachment A during the trial. Please turn to Attachment A at the end of this packet and circle the names of any person that you know or have any connection with. Please explain if that connection would impact your ability to be fair and impartial in this matter.
33. Also included in Attachment A is a list of the Court personnel, attorneys and support staff involved in this matter. Please turn to Attachment A at the end of this packet and circle the names of any person that you know of have a connection with. Please explain if that connection would impact your ability to be fair and impartial in this matter.

**PART IV: LEGAL PRINCIPLES**  
**(Questions 33 through 40)**

**Part IV explains some of the fundamental legal principles on which the Court will give instructions during the trial. If you believe you cannot follow these principles, you are duty bound to let the Court know now.**

34. (a) Every defendant is presumed innocent and cannot be convicted unless the jury, unanimously and based solely on the evidence in the case, decides that his guilt has been proven beyond a reasonable doubt. The burden of proving guilt rests entirely with the government. It never shifts to the defendant at any time. The defendant has no burden of proof at all.

Would you have any difficulty following these rules?

Yes \_\_\_\_\_ No \_\_\_\_\_

If yes, please explain:

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- (b) Under the law, a defendant need not testify. If a defendant does not testify, the jury may not consider that fact in any way in reaching a decision as to whether a defendant is guilty or not guilty. Would you have any difficulty following this rule of law?

Yes \_\_\_\_\_ No \_\_\_\_\_

If yes, please explain:

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35. An indictment itself is not evidence. It merely describes the charges made against the defendants. It is an accusation. It may not be considered by you as any evidence of the defendants' guilt. Are you able to follow this rule of law?

Yes \_\_\_\_\_ No \_\_\_\_\_

If yes, please explain:

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36. Certain witnesses in this case may be law enforcement officers.

- (a) Do you hold any beliefs or opinions that would prevent you from evaluating the testimony of a law enforcement officer fairly and impartially?

Yes \_\_\_\_\_ No \_\_\_\_\_

If yes, please explain:

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(b) Do you tend to believe that a member of law enforcement, such as a police officer or federal agent, who testifies in court is (check one):

- ☐ More likely to tell the truth than other witnesses
- ☐ About as likely to tell the truth as other witnesses
- ☐ Less likely to tell the truth than other witnesses

Please explain:

37. A law enforcement witness's testimony is not to be given any more or less credence than any other witness's testimony. Would you be able to follow the Court's instructions in this regard?

Yes \_\_\_\_\_ No \_\_\_\_\_

If no, please explain:

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38. Some of the evidence in this trial will come from the testimony of a witness who has previously engaged in criminal activity and who is testifying pursuant to an agreement with the government in the hopes of receiving a lower sentence from the Court. Such a witness is commonly referred to as a "cooperating witness" or a "cooperator." Do you tend to believe that a cooperating witness is:

- ☐ More likely to tell the truth than other witnesses
- ☐ About as likely to tell the truth as other witnesses
- ☐ Less likely to tell the truth than other witnesses

Please explain:

39. Do you have any feelings about cooperating witnesses that would affect your ability to consider such evidence fairly and impartially?

Yes \_\_\_\_\_ No \_\_\_\_\_

If yes, please explain:

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40. Do you have any opinion about the fact that the government sometimes enters into the type of agreements described above?

Yes \_\_\_\_\_ No \_\_\_\_\_

If yes, please explain:

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41. Under the law, the facts are for the jury to determine and the law is for the Judge to determine. You are required to accept the law as the Judge explains it to you even if you do not like the law or disagree with it, and you must determine the facts according to those instructions.

Would you have any difficulty following the Judge's instructions?

Yes \_\_\_\_\_ No \_\_\_\_\_

If yes, please explain:

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42. Under the law, questions of the legality of police action, such as search or arrest or search are for the Judge and not the jury. You are required to limit your consideration to the question of whether the Government has proven the guilt of a defendant beyond a reasonable doubt under the law as the Judge explains it to you.

Would you have any difficulty following this rule?

Yes \_\_\_\_\_ No \_\_\_\_\_

If yes, please explain:

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43. Under the law, the question of punishment, if any, should not enter your deliberations. Will you be able to accept that the question of punishment is for the Court alone to decide and that the possible punishment must not enter into the deliberations of the jurors as to whether a defendant on trial here is guilty?

Yes \_\_\_\_\_ No \_\_\_\_\_

If yes, please explain:

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**PART V: PERSONAL AND COMMUNITY INTERESTS AND EXPERIENCES**  
**(Questions 41-47)**

44. What community, civic, social, union, professional, fraternal, political, religious or recreational organizations do you belong to or are otherwise affiliated with?

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45. Have you held any offices or positions of leadership? ☐ Yes ☐ No

If yes, please explain. \_\_\_\_\_

46. What are your hobbies and special interests? \_\_\_\_\_

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47. What newspapers, magazines, or journals do you read on a regular basis, if any?

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48. What television shows or podcasts focused on true crime do you watch or listen to on a regular basis, if any?

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49. What other television shows, radio shows or podcasts do you watch or listen to on a regular basis, if any?

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50. What internet websites or blogs do you visit on a regular basis, if any?

\_\_\_\_\_

51. Who is the public figure you admire the most?

#### QUESTIONS ABOUT IMPLICIT/UNCONSCIOUS BIAS

52. Scientific research indicates that we all have implicit or unconscious biases. We are all a product of our experiences, our emotions; we all have perceptions and fears and stereotypes and assumptions that we make. As jurors, you are called upon to do your best to put aside any biases, prejudices or assumptions about people that you might make for reasons that have nothing to do with the evidence and instead render a verdict as objectively and impartially as you are able based upon the evidence presented during the trial. Would you have difficulty doing that? ☐ Yes ☐ No

If yes, please explain. \_\_\_\_\_

53. For example, does anyone have any particular views about a person who wears his hair in dreadlocks? ☐ Yes ☐ No

If yes, please explain. \_\_\_\_\_

54. Do you have any feelings toward any racial or ethnic group which would cause you to judge a member of that group differently? ☐ Yes ☐ No

If yes, please explain. \_\_\_\_\_

#### PART VI: CONCLUDING QUESTION

55. Do you know of any other reason at all why you might not be able to serve as a fair and impartial juror in this case?

Yes \_\_\_\_\_ No \_\_\_\_\_

If yes, please explain:

\_\_\_\_\_

#### Commented [RD(2):

The government objects to including this section. It is improper to instruct the jury about the findings of studies which have nothing to do with this case. Additionally, the government is not aware of any other cases in which the Court included an implicit/unconscious bias section in the questionnaire.

The government asked the defense for any examples where this type of section was included in a jury questionnaire. They only example they provided was the defense's proposed instructions in *U.S. v. Shelton*, 18-CR-609 (RJD), which the Court did not incorporate into the final questionnaire.

The government does not disagree with including a question that addresses the heart of the issue in the Legal Principles section, for example:

The Court will instruct you that you may not let prejudice, bias or sympathy interfere with your decision in rendering a verdict. Would you have any problem following that instruction? If yes, please explain.

Commented [RD(3): To the extent this is asked, the question should not ask "do you have any views," but do you have any views that would prevent you from following the Court's instruction to hear the evidence without bias?

Commented [RD(4): This question is duplicative and already incorporated into the government's proposal or defense counsel's proposal in question 52, above.

To the extent this is asked, the question should not be "do you have any feelings," it is do you have any views that would prevent you from following the Court's instruction to hear the evidence without bias?

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**WHEN YOU HAVE COMPLETED THE QUESTIONNAIRE AND REVIEWED  
ATTACHMENT A, PLEASE RETURN TO THE SECOND PAGE OF THIS  
QUESTIONNAIRE TO COMPLETE AND SIGN THE DECLARATION.**

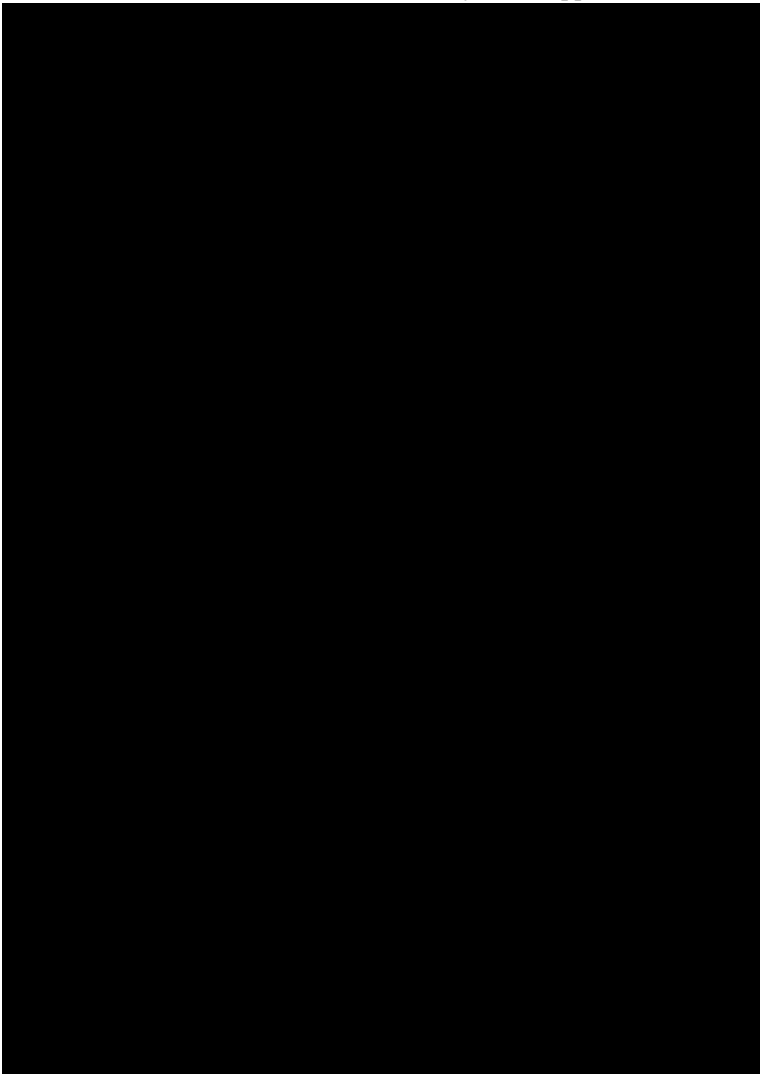
**United States v. Agoro, et al.**  
**20 Cr. 293 (WFK)**

**ATTACHMENT A:**

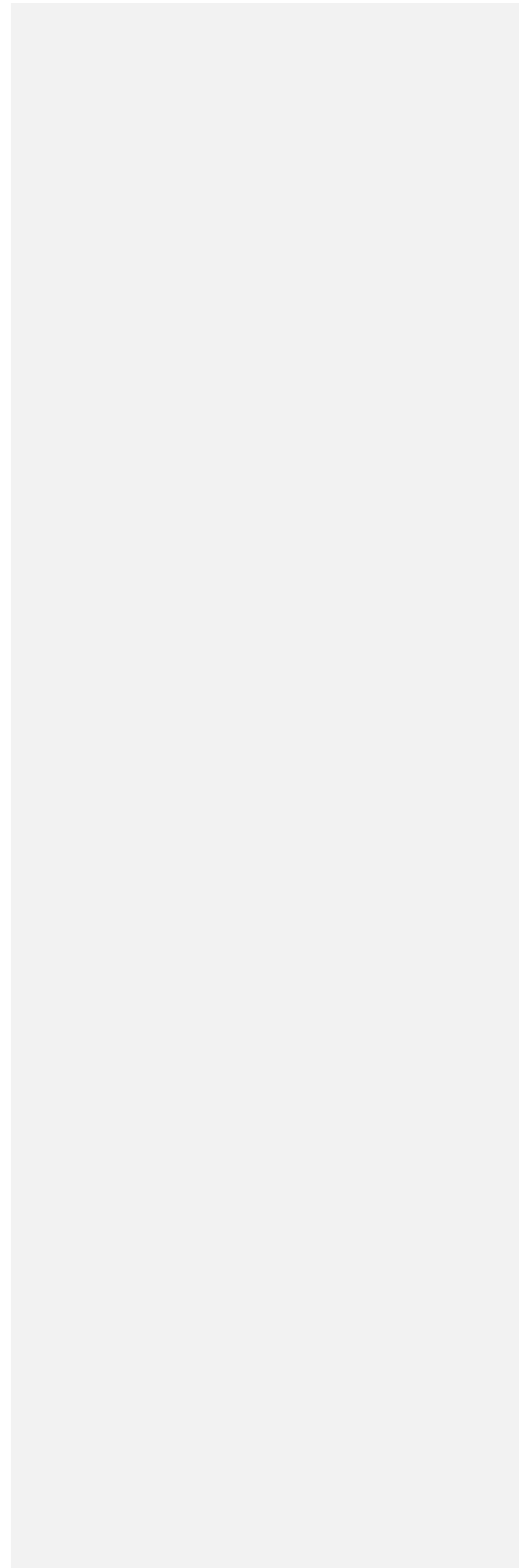
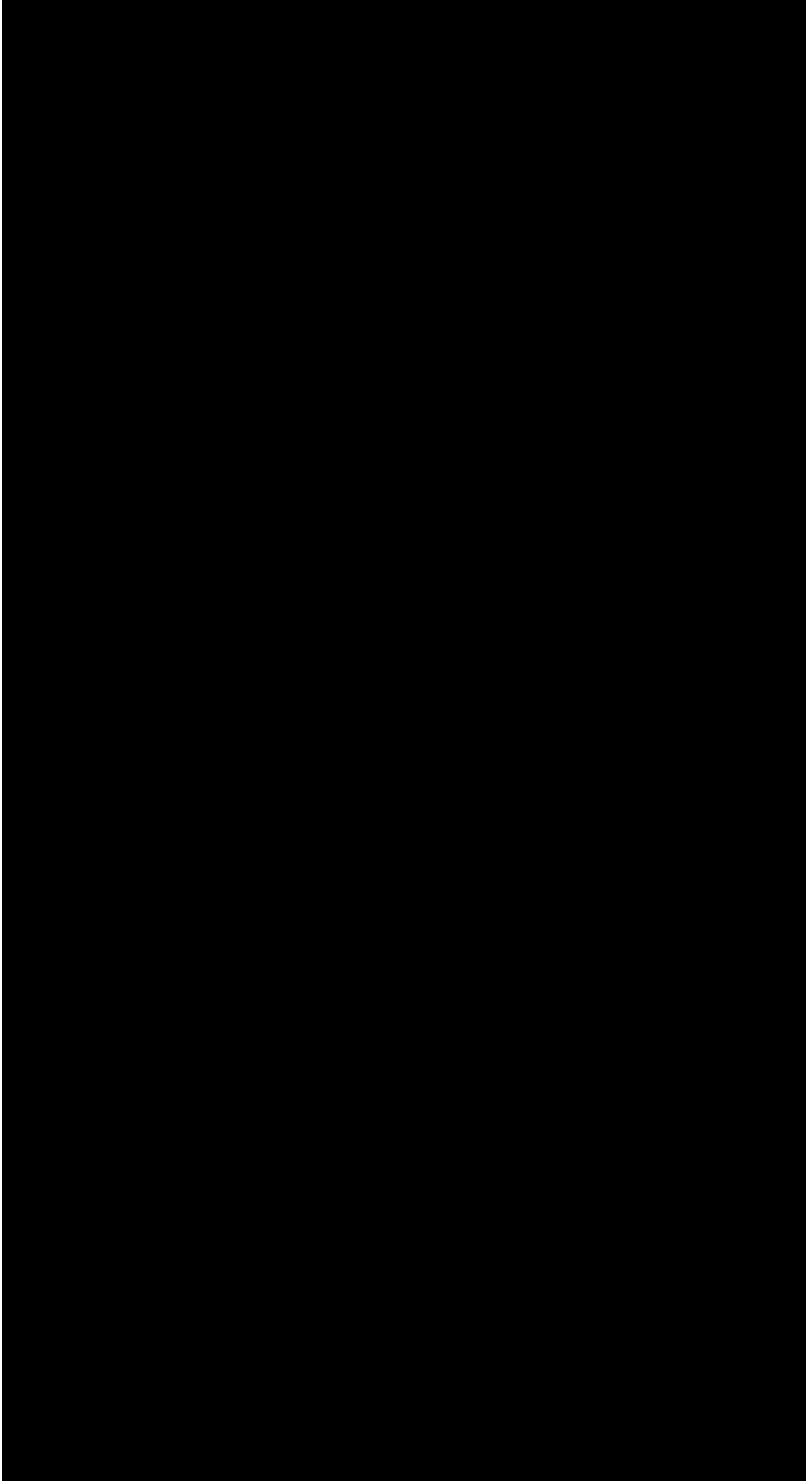
**Names of People Who Might Testify or Who May Be Discussed During Trial**

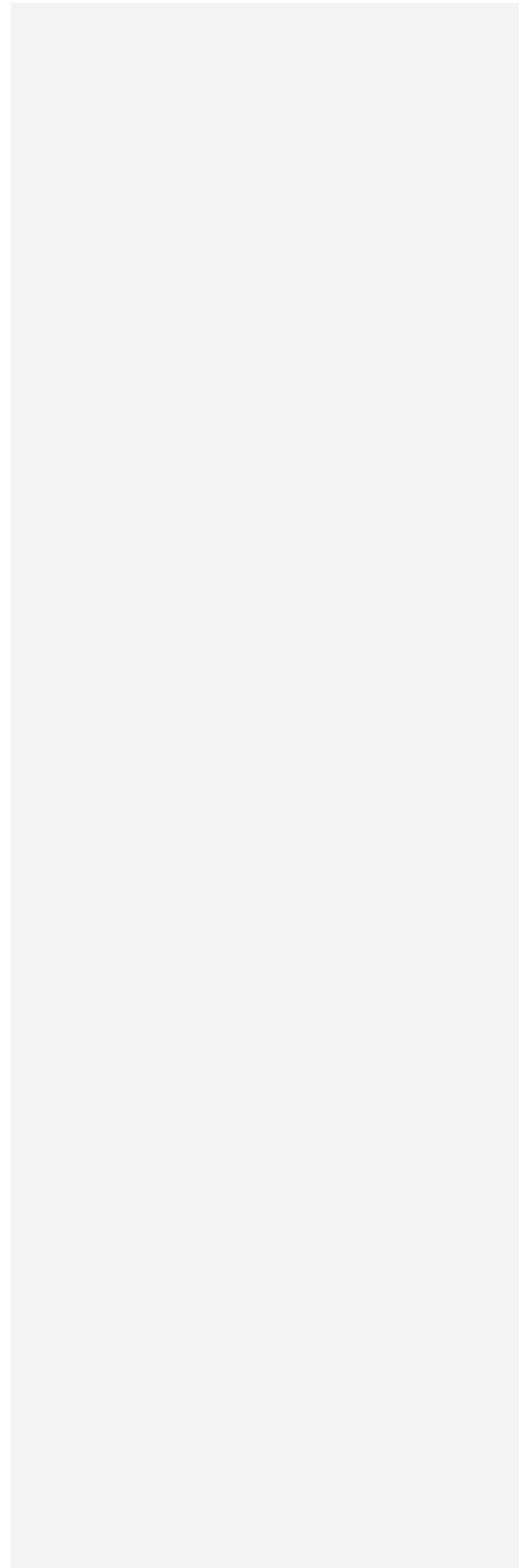
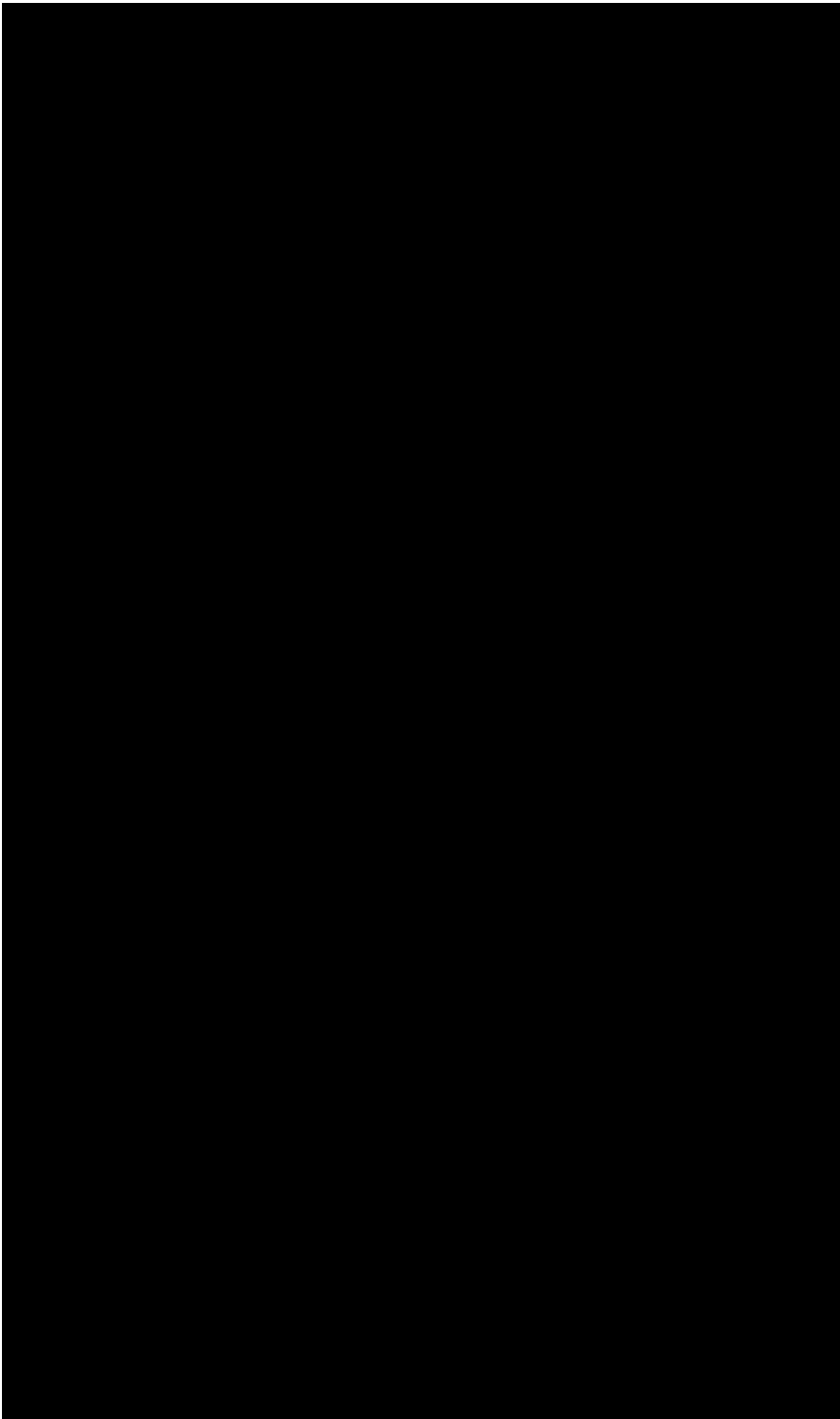
*Please circle the name of any person, entity or place listed below that you  
know or have any connection with.*

**Names of Court Personnel, Attorneys and Support Staff**

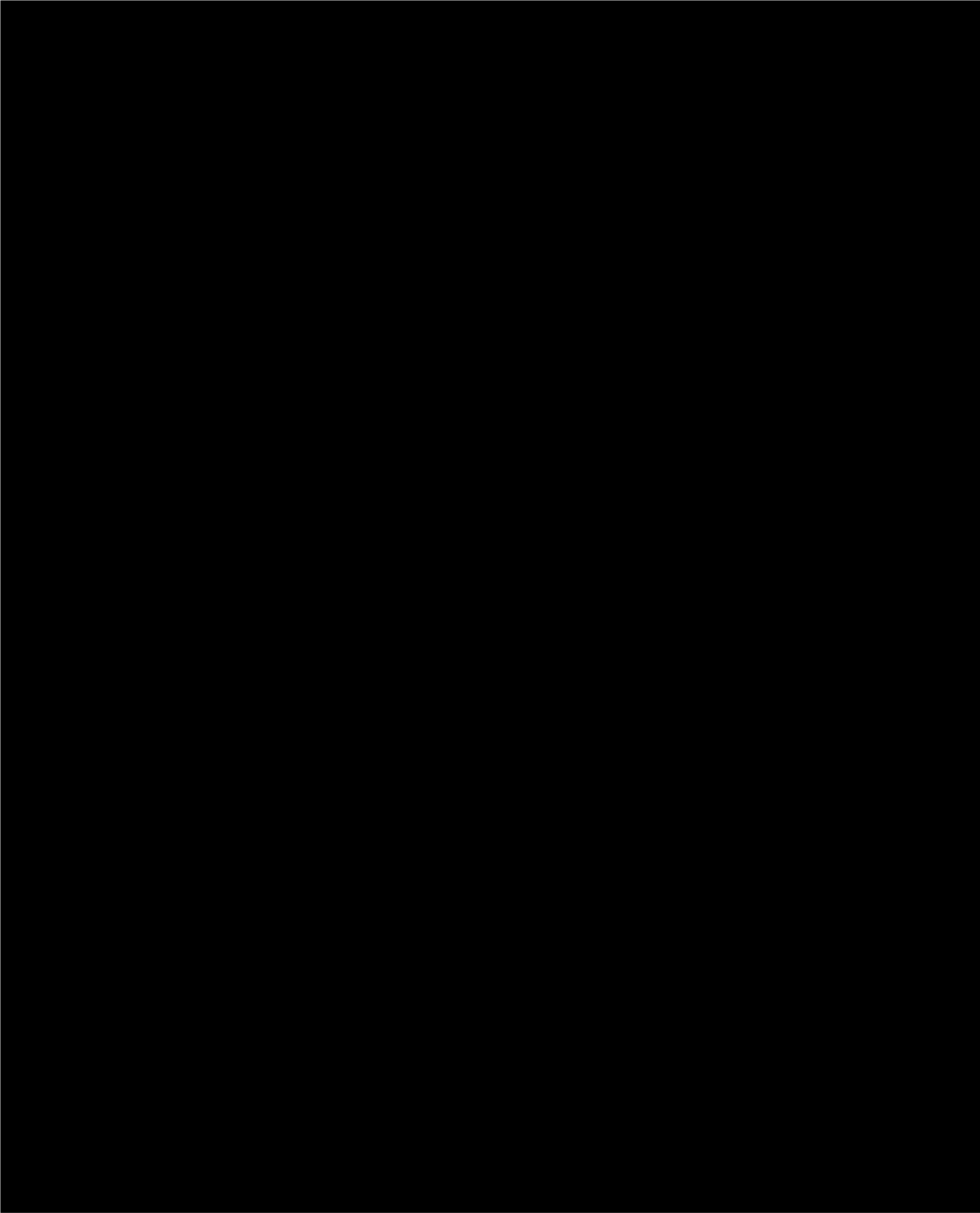








JUROR NO. \_\_\_\_\_



JUROR NO. \_\_\_\_\_

